

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

BIS ADVANCED SOFTWARE SYSTEMS, LTD.,

Plaintiff,

v.

RED BEND SOFTWARE, INC.,  
RED BEND, LTD.,  
TIME WARNER INC.,  
ICQ, INC.  
INSTALLSHIELD SOFTWARE CORP.,  
and  
SCANSOFT, INC.

Civil Action No. 04cv11960 (RWZ)

Defendants.

**ASSENTED-TO MOTION FOR FURTHER EXTENSION OF TIME**

Defendants Red Bend Software, Inc. and Red Bend, Ltd. (collectively “Red Bend”), with the agreement of Plaintiff BIS Advanced Software Systems, Ltd. (“BIS”), hereby move for a further extension of time until Friday, April 28, 2006 to respond to Plaintiff’s Motion for Reconsideration (D.I. 68).

Red Bend’s prior Motion For Extension of Time to extend the deadline by which it must respond to Plaintiff’s Motion for Reconsideration was granted by the Court on April 18, 2006, and the present deadline for Red Bend’s response is April 21, 2006. The parties are continuing to discuss the resolution of issues in connection with a potential settlement of this case and require additional time to pursue those discussions.

WHEREFORE, Red Bend respectfully requests a further extension of time up to and including Friday, April 28, 2006 to respond to Plaintiff’s Motion for Reconsideration.

**RED BEND SOFTWARE, INC., RED BEND,  
LTD.**

By their attorneys,

/s/ Miguel Danielson  
Brenda R. Sharton (BBO # 556909)  
Miguel C. Danielson (BBO # 651288)  
GOODWIN PROCTER LLP  
53 State Street  
Boston, MA 02109  
Tel: 617-570-1000  
Fax: 617-523-1231

Ethan Horwitz (*pro hac vice*)  
Anastasia Fernands (BBO# 633131)  
GOODWIN PROCTER LLP  
599 Lexington Avenue  
New York, New York 10022  
Tel: 212-813-8800  
Fax: 212-353-3555

Dated: April 20, 2006

**Certification Pursuant To Local Rule 7.1(A)(2)**

I certify pursuant to Local Rule 7.1(A)(2) that the moving party has attempted to confer in good faith with opposing counsel on the matter set forth herein and that opposing counsel has granted its consent to this motion.

I further certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on April 20, 2006.

/s/ Miguel Danielson  
Miguel C. Danielson